

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. CR-24-516-R
)	
JENNIFER BAXTER,)	
ALESHA INGRAM,)	
PAULA KELLEY,)	
VINCENT MATTHEWS,)	
MELISSA MELTON, and)	
LYNNSEE NOEL,)	
)	
Defendants.)	

**APPLICATION TO FILE EX PARTE REQUEST TO DESIGNATE CASE
AS COMPLEX AND BRIEF IN SUPPORT UNDER SEAL**

Counsel for Melissa Melton, Henry A. Meyer, III, submits this Application to file documents under seal pursuant to LCrR12.2, along with counsel for Jennifer Baxter, Peter L. Scimeca; counsel for Alesha Ingram, Jason W. Perkins; counsel for Paula Kelley, Traci Lynn Rhone, Assistant Federal Defender; counsel for Vincent Matthews, Kevin E. Krah!; and counsel for Lynnsee Noel, L. Justin Lowe.

Counsel for Lynnsee Noel is L. Justin Lowe and is privately retained at this point in time and is participating in this proposed Motion to Designate this Case as Complex.

Counsel for all named Defendants are in agreement to effectively represent these Defendants in this proceeding, that it is necessary to file an Ex Parte Motion for Designation of this Case as Complex with the Court that contains sensitive, personal, and confidential information. Counsel for Melissa Melton, Jennifer Baxter, Alesha Ingram,

Paula Kelley, Vincent Matthews, and Lynnsee Noel request that the Court consider this Ex Parte Motion without it becoming a public record in this case at this time.

Counsel for the Defendants therefore request that the Court approve this Application and enter an Order allowing the filing of the Ex Parte Motion for Designation of this case as Complex under seal.

Respectfully submitted,

/s/ Henry A. Meyer, III

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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of January, 2025, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing, which will automatically send e-mail notification of such filing to the Assistant U.S. Attorney.

/s/ Henry A. Meyer, III